

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

JH

HENRY BARROW, plaintiff  
V.

SONYA GYIMAH, defendant

} 12C6063  
} 12C6063

FILED

5-13-13  
MAY 13 2013

SCANNED at PCC and E-Mailed

5/3/13 (date) by KAS (initials)

6 (# of pages)

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTMOTION FOR AN ORDER COMPELLING DISCLOSURE OF DISCOVERY

Pursuant to Rule 27 of the Federal Rules of Civil Procedure plaintiff Henry Barrow moves this Court in the above caption and states as follows:

- 1) Plaintiff served defendant's counsel Christopher Walter, document request, Interrogatories in the postal service. The defendants were given (30) days to disclose discovery.
- 2) After (30) days the plaintiff wrote defendant's counsel requesting the disclosure of discovery and the letter has come unnoticed. Attached is the motion(s) requesting discovery disclosure. The plaintiff seeks:

- A) That all motions requesting discovery and document request be answered to interrogatories and documents request.
- B) That these request be made within (30) weeks.

Wherefore the plaintiff prays this court compels defendants to disclose evidence.

CERTIFICATE OF SERVICE

I Henry Barrow certify that have placed in U.S.P.S Motion to compel disclosure of Discovery to the clerk of court and Christopher E. Walter May 4<sup>th</sup> 2013.

Respectfully Submitted  
Henry Barrow

Henry Barrow # 884527  
P.O. Box 99

Pontiac, IL, 61761

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

HENRY BARROWS :  
v. Plaintiff } 12 C 60603  
SONYA GYIMAH et al }  
Defendants }

PLAINTIFF FIRST SET OF DOCUMENT REQUESTS

Pursuant to Rule 29 of the Federal Rules of civil procedure, plaintiff HENRY BARROWS hereby propounds his First set of document request. Defendants is to produce all responsive documents within (30) days of service hereof to:  
HENRY BARROWS #892577, P.O. Box 99, Pontiac, IL, 61764.

REQUEST NO. 1: All documents, including policies, guidelines, instructions and/or hand books that refer or relate to J DOC procedures related to Correctional officers) suicidal inmates training, Crisis team member and training of staff, and any document relevant to how officials are suppose to handle self injurious and suicidal inmates.

REQUEST NO. 2: All documents, including policies, guidelines, instructions and/or hand books that refer or relate to J DOC procedures on Suicide watch for self injurious and suicidal inmate, and how inmates are placed on suicide watch.

REQUEST NO. 3: All complaints, grievances, Incident Reports, or any other similar documents relating to defendants, including without limitation any summaries, reports or analyses thereof.

REQUEST NO. 4: All documents that refer or relate to the personnel and disciplinary files of defendant, including without limitation, any summaries, reports or analyses thereof.

REQUEST NO. 5: All documents that refer or relate to any civil cases to which the defendants has been a party in the last (5) years, including but not limited to any testimony, summaries, reports or analyses thereof.

REQUEST NO:6. All documents that refer or relate to any health care provided to Mr. BARROWS from April 2011 to December 2011, including but not limited to medication, treatment, examination, laboratory studies, or X-RAYS.

March 29<sup>th</sup> 2013

Henry Barrow BB2577  
P.O. Box 99  
Pontiac, IL, 61764

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

HENRY BARROWS  
v. PLAINTIFF  
SONYA GYIMAH et al  
Defendants  
12-C-6063

PLAINTIFFS FIRST SET OF INTERROGATORIES  
TO DEFENDANTS SONYA GYIMAH, RALPH BURKYBLE  
NELSON HOLMAN AND D.L. WILLIAMS

Pursuant to Rule 33 of the Federal Rules of civil procedure, plaintiff Henry BARROWS hereby propounds his first set of Interrogatories to defendants Sonya GYIMAH, Ralph Burkyble, Nelson Holman, and D.L. Williams. Defendants is to produce full and complete responses in writing and sworn under oath to the Interrogatories herein within thirty (30) days of service hereof to: Henry BARROWS 882577, P.O. Box 99, Pontiac, IL 61764.

INTERROGATORY NO. 1: Identify your current official employment at Stateville, any former positions you have held at Stateville, any former positions you have held at other correctional facilities. For each of the positions, please include the beginning and end date of that employment, position, a brief description of your main duties associated with that position, and the reason you left that position or changed positions.

INTERROGATORY NO. 2: Describe with full particularity any disciplinary action, investigation, or reprimand against you or involving you while you have been a correctional officer employed at Stateville or any other correctional center.

INTERROGATORY NO. 3: Describe with full particularity any lawsuit involving the Civil Right Act of 1871, 42 U.S.C. § 1983 to which you have been a party or testified. Please include in your response the court, the caption and case number of each such case, the facts surrounding the case, the outcome of the case, the approximate date of your testimony, whether you testified as an expert, and whether you testified on your own behalf or on behalf of the defendant or the plaintiff.

INTERROGATORY NO. 4: Describe with full particularity the official duty, in which you must carry out when inmates request a crisis team, psych doctor, or must be placed on suicide watch.

INTERROGATORY NO. 5: Describe with full particularity the official duty in which you must carry out when other officials deny or refuse to follow policies, procedures, or guidelines when inmates request crisis team, psych doctor, or suicide prevention help.

March 24<sup>th</sup> 2013

Kenny Darnold B90571  
P.O. Box 99  
Pontiac, IL 61764



## CERTIFICATE OF SERVICE

I Henry BARROWS certify that I have placed in the U.S.P.S. motion of First SET of INTERROGATORIES, FIRST SET OF ADMIT, AND FIRST SET OF DOCUMENT Request to defendants Sanya Gyimah, Ralph Burkybile, Nelson Holman, and D.L. Williams to:

CHRISTOPHER E. WALTER  
ASST. ATT. GENERAL  
100 W. Randolph St 12<sup>th</sup> Fl  
Chicago IL 60601

ON MARCH 29<sup>th</sup> 2013

Henry Barrows 382577  
P.O. Box 99  
Pontiac, IL, 61767